

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,
Plaintiff

v.

MONEYGRAM INTERNATIONAL,
INC.,
Defendant

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CRIMINAL No. 12-cr-00291

(Chief Judge Conner)

GOVERNMENT’S UNOPPOSED MOTION TO DISMISS
THE CRIMINAL INFORMATION WITH PREJUDICE

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States Attorney’s Office for the Middle District of Pennsylvania and the United States Department of Justice’s Money Laundering and Asset Recovery Section (collectively, the “United States” or “government”), hereby move to dismiss with prejudice the Criminal Information filed in the above-captioned case against the defendant, MoneyGram International, Inc. (“MoneyGram”). In support of this request, the United States relies on the following:

1. On November 9, 2012, the United States filed with this Court a Criminal Information charging MoneyGram with: (1) aiding and abetting wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2, and (2) willfully violating the Bank Secrecy Act (“BSA”) for failing to implement and maintain an effective anti-money laundering program, in violation of Title 31, United States Code,

Sections 5318(h) and 5322.

2. On November 9, 2012, the United States and MoneyGram entered into a five-year Deferred Prosecution Agreement (the “DPA”) that deferred prosecution of MoneyGram on charges of Aiding and Abetting Wire Fraud, 18 U.S.C. §§ 1343 and 2, and violation of the BSA, 31 U.S.C. §§ 5318(h) and 5322, for a period of five years. ECF No. 3. MoneyGram forfeited \$100 million in compliance with the DPA.

3. On November 1, 2017, the Parties filed the first of seven joint motions to extend the DPA. See ECF No. 20. The Parties ultimately agreed to, and the Court ordered, extensions of the DPA through November 9, 2018.

4. The Department determined that MoneyGram breached the DPA and on November 8, 2018, the Parties entered into the Amendment to and Extension of Deferred Prosecution Agreement (the “Amendment”), which extended the term of the DPA continuing to defer prosecution of MoneyGram on charges of Aiding and Abetting Wire Fraud, 18 U.S.C. §§ 1343 and 2, and violation of the BSA, 31 U.S.C. §§ 5318(h) and 5322, through May 10, 2021. ECF No. 34, No. 34-1.

5. In compliance with its agreement in the Amendment to forfeit \$125 million, MoneyGram transferred to the United States \$70 million in November 2018 and \$55 million in April 2021. See ECF No. 40.

6. On April 20, 2021, pursuant to the terms of the Amendment, the monitor certified to MoneyGram and the United States that MoneyGram’s anti-fraud and anti-

money laundering compliance program, including its policies and procedures, are reasonably designed and implemented to detect and prevent fraud and money laundering and to comply with the Bank Secrecy Act.

7. On May 10, 2021, pursuant to the Amendment, MoneyGram certified through its Chief Executive Officer and Chief Compliance Officer to the United States that MoneyGram had fulfilled its obligations under the DPA and the Amendment.

8. The United States has determined that since November 8, 2018, MoneyGram has complied with its obligations under the DPA and the Amendment and that dismissal with prejudice of the Criminal Information is appropriate.

WHEREFORE, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States respectfully requests this Court grant the Government's Motion to Dismiss With Prejudice the Criminal Information in the above-captioned matter.

Date: 05/17/2021

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